



ORIGINAL

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May 14, 2004

05/04/2004

Mr. Harry R. Steinmetz  
US Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103-2029



SDMS DocID 2126312

Re: Mallard Manufacturing Corp of Sterling, Ill. And Safety Light Corporation Site

Dear Mr. Steinmetz,

This letter is a response to the letter dated May 4, 2004, from the US Environmental Protection Agency to Mallard Manufacturing regarding Safety Light Corporation Site, Bloomsburg, Pa.

As I told you on the phone, the Mallard Manufacturing Corp described in the record sheet included with the letter is a different entity than Mallard Manufacturing Corp of Sterling, Ill. The dates shown on the document are in 1955, while Mallard Manufacturing of Sterling Illinois originated as Mallard Plastics of Sterling Illinois in 1961. I have not been able to locate copies of our original articles of incorporation. However, I have included the following as proof of this Mallard's history.

- 1) Copy of 1<sup>st</sup> page of Mallard Plastics By-Laws, stating that the first board meeting will be held in February of 1962.
- 2) Copy of 1<sup>st</sup> page of Mallard's 18<sup>th</sup> Director's meeting, held in 1972, showing company still operating as Mallard Plastics.
- 3) Copy of 1<sup>st</sup> page of Mallard's 21<sup>st</sup> Director's meeting, held in 1976, showing company operating as Mallard Manufacturing.

Mallard Manufacturing Corp of Sterling, Ill., has been in the business of molding plastics and building conveyor components for its' entire history. Mallard Manufacturing is not and has not been a generator of hazardous waste products. Mallard's main processes have been assembly.

I hope that this letter and attached documentation is sufficient for your purposes. If you have any questions, please give me a call.

With Regards,

Michael R. Gunderson  
VP/General Manager

*"Gravity Conveyor Systems & Components Since 1961"*

DIRECTORS MEETING NUMBER 18  
MALLARD PLASTICS, INC.

The 18th meeting of the Board of Directors of Mallard Plastics, Inc., an Illinois corporation, was held on Monday, the 7th day of February, 1972, at 101 East 27th Street, Sterling, Illinois.

All of the directors of the company were present, being Warren P. Wahl, John F. Wahl and Margaret E. Wahl.

The President, John F. Wahl, presided and advised the other directors that it would be in order to nominate and elect officers for the coming year.

Thereupon the following persons were nominated as officers of the corporation to serve for the term provided in the by-laws:

President	John F. Wahl
Vice-President	Warren P. Wahl
Secretary	Margaret E. Wahl
Assistant Secretary	Warren P. Wahl
Treasurer	John F. Wahl

No further nominations being made, the nominations were closed and the directors proceeded to vote on the nominees. All the directors present at the meeting having voted and the vote having been counted, the President announced the foregoing nominees had been duly elected to the offices set before their respective names by the affirmative vote of all directors of the corporation to serve for the term provided in the by-laws.

The President advised that the stock of David E. Erby had been re-purchased by the corporation pursuant to the Buy-Sell Agreement with the company. A motion was duly made, seconded and unanimously approved that the 24 shares acquired by the company from David E. Erby be designated as Treasury shares and be held as such.

A discussion was held with reference to the possibility of

BY-LAWS  
OF  
MALLARD PLASTICS, INC.

ARTICLE I  
OFFICES

The principal office of the corporation in the State of Illinois shall be located in the City of Sterling and County of Whiteside. The corporation may have such other offices, either within or without the State of Illinois, as the business of the Corporation may require from time to time.

The registered office of the corporation required by The Business Corporation Act to be maintained in the State of Illinois may be, but need not be, identical with the principal office in the State of Illinois, and the address of the registered office may be changed from time to time by the Board of Directors.

ARTICLE II  
SHAREHOLDERS

SECTION 1. ANNUAL MEETING. The Annual Meeting of the shareholders shall be held on the first Monday in February in each year, beginning with the year 1962, at the hour of 1:30 P. M., for the purpose of electing directors and for the transaction of such other business as may come before the meeting. If the day fixed for the Annual Meeting shall be a legal holiday, such meeting shall be held on the next succeeding business day. If the election of directors shall not be held on the day designated herein for any Annual Meeting, or at any adjournment thereof, the Board of Directors shall cause the election to be held at a meeting of the shareholders as soon thereafter as conveniently may be.

SECTION 2. SPECIAL MEETINGS. Special meetings of the shareholders may be called by the President, by the Board of Directors or by the holders of not less than one-fifth of all the outstanding shares of the corporation.

SECTION 3. PLACE OF MEETING. The Board of Directors may designate any place, either within or without the State of Illinois, as the place of meeting for any Annual Meeting or for any special meeting called by the Board of Directors. A Waiver

Minutes of Meeting of  
Board of Directors

A meeting of the Board of Directors of Mallard Manufacturing Corporation was held Monday, the 2nd of February, 1976 at 2 P.M. at 101 E. 27<sup>th</sup> St., Sterling, Ill.

All of the directors of the Company were present, being:

John F. Wahl  
Richard S. Roeing  
Margaret E. Wahl

President John Wahl presided and advised that it would be in order to nominate and elect officers for the coming year. Thereupon, the following persons were nominated and duly elected as officers of the Corporation to serve for the term provided in the by-laws:

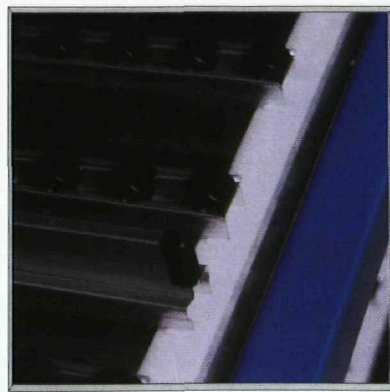
President-----	John F. Wahl
Vice-President-----	Richard S. Roeing
Secretary-----	Margaret E. Wahl
Asst. Secretary-----	Richard S. Roeing
Treasurer-----	John F. Wahl

A review and general discussion of 1975 business took place.

An operating budget for 1976 was presented by R. Roeing and approved by the Board.

Approval was given for continuation of the year-end Bonus Plan without change for the President and Vice-President for 1976. Notice was made that no bonuses were earned for 1975 results due primarily to the increased purchased material costs in the conveyor division and start-up costs of the "Merc" Radio Control Division.

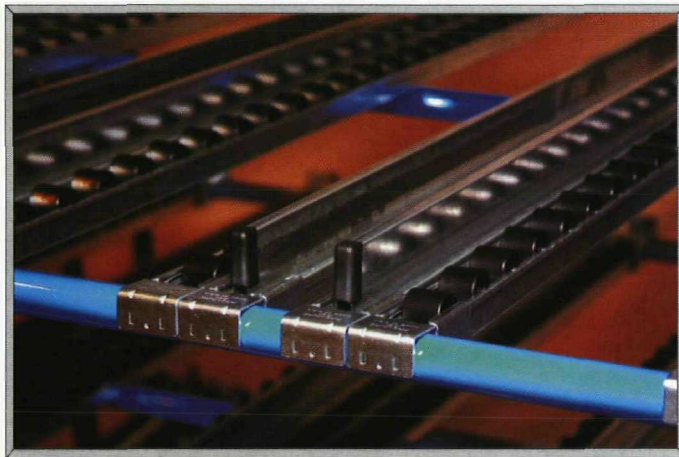
The Board authorized the Company to enter into a purchase agreement



## CARTON FLOW APPLICATIONS

### ★ Features

- Self-guiding flanged or flat rollers
- Steel axles for durability
- Many designs for various loads
- Galvanized steel channels
- Many accessories available
- Totes and cartons up to 500 lbs.



### ★ System Applications

- Retail Displays
- Health and Beauty
- Food and Beverage
- Warehouse Order Picking
- Assembly Workstations
- Lean Manufacturing

### Who uses Mallard Systems? Companies like:

- |                  |                 |                       |                    |
|------------------|-----------------|-----------------------|--------------------|
| • U.S. Navy      | • Toyota (TMMI) | • Lucent Technologies | • Tyco             |
| • Dayco Products | • Rayovac       | • Omaha Steaks        | • Johnson Controls |
| • Bluebird Corp. | • Regis         | • B.F. Goodrich       | • U.S. Post Office |

Distributed By:



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# WHY BUY MALLARD®?

**GRAVITY FLOW STORAGE SYSTEMS DESIGNED  
TO SAVE SPACE, TIME, ENERGY AND MONEY**

**QUALITY**



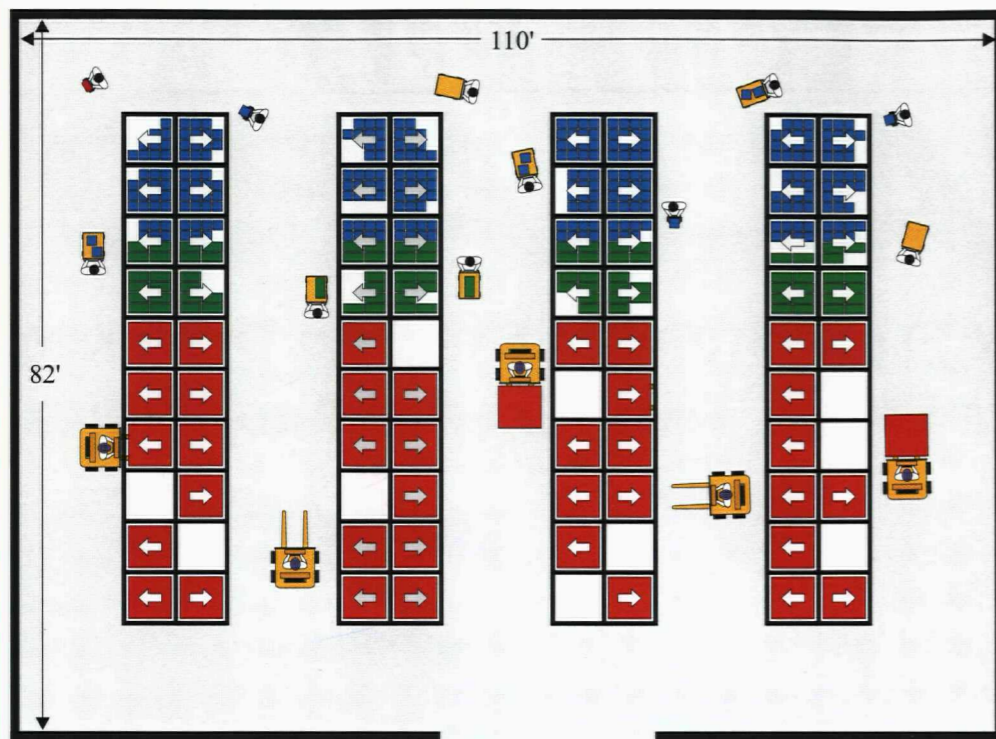
**DEPENDABILITY**



**FLEXIBILITY**



Four Hand Trucks
Seven Service Carts
Five Fork-lifts
Sixteen Total Personnel
Square Footage Required 9020



Pallet storage is 3 levels high, Tote / Carton storage is 5 levels high

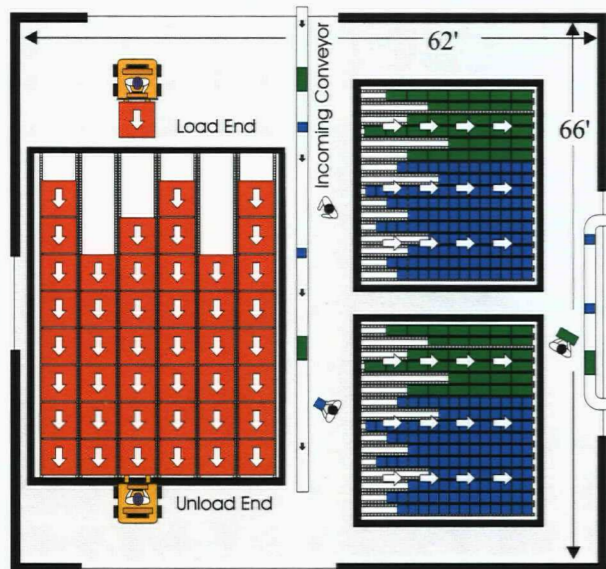
### DISADVANTAGES

- High labor costs
- Slow operation
- Frequent product damage
- Inefficient inventory control
- Large space requirements
- Traffic congestion
- Limited access
- Poor space utilization
- Excessive equipment
- High overhead

144 Pallet Positions (48"x48"x48")
480 Tote Positions (12"x24"x12")
1600 Carton Positions (12"x12"x12")

Square Footage Required 4092
Total Personnel
Five Fork-lifts
Two Service Carts
None Hand Trucks
None

## Conventional Static Storage VS. High-Density **MALLARD** Systems



Pallet storage is 3 levels high, Tote / Carton storage is 5 levels high

### ADVANTAGES

- Lower labor cost
- Reduced energy costs
- Less product damage
- Increased throughput
- FIFO/LIFO friendly
- Ergonomic designs
- Better inventory control
- Less floor space
- No traffic congestion
- Low overhead

### SPACE SAVINGS

In the typical comparison above and at left, the Mallard Storage System offers comparable capacity in less than half the floor space - doubling the potential for increased storage capacity in an existing area or freeing up valuable floor space for production or other activities.

### TIME AND LABOR SAVINGS

Restricting loading and unloading tasks to only two locations dramatically reduces the time it takes to place and pick products. As a result, workers increase their individual output, have less fatigue and boost overall productivity. Ideal for just-in-time picking operations. Significant labor savings of up to 75% also allow for effective redistribution of human resources to other areas.

### EQUIPMENT AND ENERGY SAVINGS

With fewer square feet to light, heat or air condition, energy costs are lowered. With fewer fork trucks to lease or purchase, equipment operating and maintenance costs are also reduced. Human energy resources benefit too, since less effort is needed to locate and select pallets, totes and cartons.

# PALLET FLOW APPLICATIONS



Cosco Distribution Center



Magnum systems with Mallard speed controllers

### ★ Benefits:

- Very versatile designs
- Loads up to and exceeding 4000 lbs.
- 12 ga. standard steel frames, 10 gauge available
- Optional accessories available
- Many designs for various loads / pallets

### ★ System Applications

- Metal Fabricating
- Automotive
- Warehousing
- Distribution centers
- Mail Order
- Heavy Manufacturing
- Coolers / Freezers



Bridgestone APM- Upper Sandusky, OH



Elkay- Bolingbrook, IL.

### Who uses Mallard Systems? Companies like:

- Caterpillar
- Anheuser-Busch
- Chrysler
- Bridgestone APM
- Harley Davidson
- Elkay
- Hewlett-Packard
- Kenworth Truck Co.
- Whirlpool
- Nestle Foods
- Coca-Cola
- Akzo-Nobel